

Message

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**From:** Johnson, Ken-E [Johnson.Ken-E@epa.gov]  
**Sent:** 5/24/2022 3:35:03 PM  
**To:** Maples, Brandon [Maples.Brandon@epa.gov]; Ellinger, Scott [Ellinger.Scott@epa.gov]; Bierschenk, Arnold [bierschenk.arnold@epa.gov]; Chaudhary, Sona [Chaudhary.Sona@epa.gov]  
**Subject:** FW: Hackberry Carbon Sequestration  
**Attachments:** HCS LLC NOD attachment1.pdf; HCS LLC\_NOD sc signed.pdf

fyi

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**From:** Gilbert, Maurice <MGilbert@SemptraGlobal.com>  
**Sent:** Tuesday, May 24, 2022 7:19 AM  
**To:** Friesenhahn, Brody <friesenhahn.brody@epa.gov>  
**Cc:** Ussery, Ian <Ussery.Ian@epa.gov>; Yun, Samuel <Yun.Samuel@epa.gov>; Johnson, Ken-E <Johnson.Ken-E@epa.gov>; Tomaski, Richard <rtomaski@SemptraGlobal.com>; Stephen Lee <Stephen.Lee@LA.gov>; Maples, Brandon <Maples.Brandon@epa.gov>; Steve Pattee <steve@lonquist.com>; Theresa Cu <theresa.cu@lonquist.com>  
**Subject:** Hackberry Carbon Sequestration

Thank you Brody for the email and HCS and its consultants will review and respond. One question, do you folks prefer a single response to the comments and questions in the NOD or would you like to receive HCS responses as we complete them? Also I assume the appropriate filing of the response would be the GSDT site?

In regard to the question you posed at the end of your email:

“So if I’m understanding this correctly, the applicant is hoping to construct a stratigraphic test well with the hopes of eventually converting the well to an injector?”

HCS staff in developing wells with prior UIC Classes, Class II Hydrocarbon Storage and Class III brine mining wells, have generally operated under a two step process. The first is an authorization to construct and the second is authorization to inject. Since Class VI process is new to HCS, the concept of a two step process appears to be the guidance for Class VI as well.

The logic I am following, which may not be correct, is that the next well we develop will be located at the expected site of the injection well. During the drilling and testing of the well, under an authorization to construct, the information that is insufficient, derived from the well drilled in 2021, will be planned to be gathered and will allow for updating prior to seeking authorization to inject. Since the well will be located on the site of the desired CO2 injection, all information will certainly be site specific. HCS would seek permission from the EPA and authorization to construct under the first step in the Class VI process as well as permissions to drill and construct with the LDNR and then if the well drilling and testing and data gathered support HCS plans, HCS would seek an authorization to inject under the requirements of UIC Class VI.

I hope my thoughts are clear and look forward to moving the process along.

Regards,

## Maurice Gilbert

Chief Engineer  
1500 Post Oak Blvd Suite 1000  
Houston, Tx 77056

Ex. 6 Personal Privacy (PP)

[mgilbert@sempraglobal.com](mailto:mgilbert@sempraglobal.com)



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**From:** Friesenhahn, Brody <[friesenhahn.brody@epa.gov](mailto:friesenhahn.brody@epa.gov)>

**Sent:** Monday, May 23, 2022 3:38 PM

**To:** Gilbert, Maurice <[MGilbert@SempraGlobal.com](mailto:MGilbert@SempraGlobal.com)>

**Cc:** Ussery, Ian <[Ussery.Ian@epa.gov](mailto:Ussery.Ian@epa.gov)>; Yun, Samuel <[Yun.Samuel@epa.gov](mailto:Yun.Samuel@epa.gov)>; Johnson, Ken-E <[Johnson.Ken-E@epa.gov](mailto:Johnson.Ken-E@epa.gov)>; Tomaski, Richard <[rtomaski@SempraGlobal.com](mailto:rtomaski@SempraGlobal.com)>; Stephen Lee <[Stephen.Lee@LA.gov](mailto:Stephen.Lee@LA.gov)>; Maples, Brandon <[Maples.Brandon@epa.gov](mailto:Maples.Brandon@epa.gov)>

**Subject:** [EXTERNAL] RE: draft email to EPA

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Hi there Maurice,

Seems like your email came at the perfect time. We just issued a formal information request via the GSDT that includes a notice of deficiency (which I have attached to this email). The notice references a detailed list of EPA comments that are contained within Attachment 1.

We feel that the construction of a stratigraphic test well would significantly help in generating a more thorough characterization of the site.

So if I'm understanding this correctly, the applicant is hoping to construct a stratigraphic test well with the hopes of eventually converting the well to an injector?

Thanks so much,

Brody

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**From:** Gilbert, Maurice <[MGilbert@SempraGlobal.com](mailto:MGilbert@SempraGlobal.com)>

**Sent:** Monday, May 23, 2022 1:56 PM

**To:** Friesenhahn, Brody <[friesenhahn.brody@epa.gov](mailto:friesenhahn.brody@epa.gov)>

**Cc:** Ussery, Ian <[Ussery.Ian@epa.gov](mailto:Ussery.Ian@epa.gov)>; Yun, Samuel <[Yun.Samuel@epa.gov](mailto:Yun.Samuel@epa.gov)>; Johnson, Ken-E <[Johnson.Ken-E@epa.gov](mailto:Johnson.Ken-E@epa.gov)>; Tomaski, Richard <[rtomaski@SempraGlobal.com](mailto:rtomaski@SempraGlobal.com)>; Stephen Lee <[Stephen.Lee@LA.gov](mailto:Stephen.Lee@LA.gov)>

**Subject:** FW: draft email to EPA

**Importance:** High

Good Afternoon Brody: I was wondering if there has been any updates to the guidance documents that we continue to focus on for the Class VI application. Hackberry Carbon Sequestration continues to evaluate the geology in and around our project and is focusing on the opportunity to acquire more well information thru the authorization to construct a Class VI investigation well where we hope to eventually confirm the suitability for conversion to Class VI injection well.

For your information my employer sent out this public press release earlier today.

Regards

**Maurice Gilbert**

Chief Engineer  
1500 Post Oak Blvd Suite 1000  
Houston, Tx 77056

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**From:** Gilbert, Maurice

**Sent:** Tuesday, April 26, 2022 11:49 AM

**To:** Friesenhahn, Brody <[friesenhahn.brody@epa.gov](mailto:friesenhahn.brody@epa.gov)>

**Cc:** Ussery, Ian <[Ussery.Ian@epa.gov](mailto:Ussery.Ian@epa.gov)>; Yun, Samuel <[Yun.Samuel@epa.gov](mailto:Yun.Samuel@epa.gov)>; Johnson, Ken-E <[Johnson.Ken-E@epa.gov](mailto:Johnson.Ken-E@epa.gov)>; Stephen Lee <[Stephen.Lee@LA.gov](mailto:Stephen.Lee@LA.gov)>; Tomaski, Richard <[rtomaski@SempraGlobal.com](mailto:rtomaski@SempraGlobal.com)>

**Subject:** Hackberry Carbon Sequestration

Good Morning Brody: just checking in with you folks and seeing if you have any questions regarding the Hackberry Class VI application?

Regards

**Maurice Gilbert**

Chief Engineer  
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**From:** Friesenhahn, Brody <[friesenhahn.brody@epa.gov](mailto:friesenhahn.brody@epa.gov)>

**Sent:** Wednesday, March 16, 2022 3:12 PM

**To:** Gilbert, Maurice <[MGilbert@SempraGlobal.com](mailto:MGilbert@SempraGlobal.com)>

**Cc:** Ussery, Ian <[Ussery.Ian@epa.gov](mailto:Ussery.Ian@epa.gov)>; Yun, Samuel <[Yun.Samuel@epa.gov](mailto:Yun.Samuel@epa.gov)>; Johnson, Ken-E <[Johnson.Ken-E@epa.gov](mailto:Johnson.Ken-E@epa.gov)>

**Subject:** [EXTERNAL] hackberry meeting

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Maurice,

Thanks again for the informative presentation.

We will certainly be keeping everyone posted as we move forward with the review process.

All the best,

Brody

**Brody P. Friesenhahn**

Geologist

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